Ed
Eric Hansen will provide the requested info + will advise us if he needs more material from us. Eric does not see a problem.

Matt
Ed
Nate

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave. S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

June 20, 1995

Mr. Gerald Brown
Manager, Safety and Environment
Ash Grove Cement Company
3801 East Marginal Way, South
Seattle, Washington 98134

Dear Mr. Brown:

Thank you for the June 6, 1995 application for Amendment 1 to Ash Grove Cement Company's PSD approval. I received it on June 6, 1995. Based upon the comments received and my review of the application, I need additional information to process the approval. Comments and questions are as follows:

- **Plume visual impact due to SO_2 increase.** *Please evaluate visibility impacts resulting from emissions increases at the Ash Grove facility, assuming a SO_2 to SO_4 conversion rate of 6 percent per hour.* Clint Bowman, as Chief Air Quality Modeler of the Department of Ecology, has reviewed the application, and supplied the following comment to me via E-mail:

  > "I did reach an agreement with Eric to use a ratioing approach in computing the effect of the increased emissions by using SCREEN2. The only part of this analysis that I would change at this time deals with the visibility analysis. Normally we (NPS & USDA FS) would use a SO_2 to SO_4 conversion rate of 6% per hour in the visibility evaluation... I think, with the increased emphasis on visibility and other AQRVs, that we should request an evaluation of visibility impacts with a 6% per hour conversion rate. (Such a calculation will necessarily be somewhat of a kluge since VISCREEN has no mechanism at all for inputting the conversion rate.) It can be approximated by using as an input for the amount of SO_4 a calculated amount of SO_4 converted in the travel time from emission to Class I boundary."

- **Short-term mass emission limits for NO_X, SO_2 and CO.** Please supply calculations showing how requested pollutant levels (1,049 ppm CO, for example) relate to current allowable levels (1,000 ppm CO), given the difference between stack flows projected during the design phase of the project versus actual measured stack flows.

If you have questions or comments please contact me at (206) 649-7103.

Sincerely,

Alan T. Butler

Alan T. Butler, P.E.
Environmental Engineer
Washington Department of Ecology

cc: Eric Hansen, Mc Culley, Frick & Gilman, Inc.
Ray Nye, EPA Region X
Alan Newman, Ecology
Jay Willenberg, PSAPCA
Joe Williams, Ecology

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